

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

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**IN RE INTEL CORP. DERIVATIVE  
LITIGATION**  
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**C.A. No. 1:09-cv-867-JJF**

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
SETTLEMENT AND FOR AN ORDER APPROVING NOTICE AND SETTING A  
HEARING FOR FINAL APPROVAL OF THE SETTLEMENT**

Plaintiffs Louisiana Municipal Police Employees' Retirement System ("MPERS"), and Charles A. Gilman ("Gilman"), Plaintiffs in the above shareholder's derivative actions pending in this Court, by their counsel ("Delaware Plaintiff's Counsel") move for an order pursuant to Fed. R. Civ. P. 23.1: (i) granting preliminary approval to the Settlement proposed in the accompanying Stipulation of Settlement dated as of May 25, 2010, (the "Stipulation") between Plaintiffs and nominal defendant Intel Corporation ("Intel") and individual defendants Craig R. Barrett, Carol Bartz, Charlene Barshefsky, Susan L. Decker, John J. Donahoe, D. James Guzy, Sr., Paul S. Otellini, David S. Pottruck, James D. Plummer, Jane E. Shaw, David B. Yoffie, and Frank D. Yeary; (ii) approving the form of and manner of dissemination of the notice to Intel's shareholders of record; and (iii) setting a date and time for the final Settlement Hearing.

Plaintiffs submit herewith: (a) Plaintiffs' Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement; (b) the Stipulation, with

accompanying exhibits, including a form of Scheduling Order to approve dissemination of the Notice and to set a Hearing for Final Approval of the Settlement, a form of Notice to be disseminated to Intel's shareholders, and a form of Final Judgment.

Wherefore, Plaintiffs respectfully request that this Motion be granted, and the Court schedule a final settlement Hearing for the week of July 19, 2010.

Dated: May 25, 2010

**BIGGS & BATTAGLIA**

By: /s/ Robert D. Goldberg  
Robert D. Goldberg (ID #631)  
921 North Orange Street  
Wilmington, Delaware 19899  
(302) 655-9677  
goldberg@batlaw.com

Attorneys for Delaware Plaintiffs

OF COUNSEL:

**PASKOWITZ & ASSOCIATES**

Laurence D. Paskowitz  
Roy L. Jacobs  
Angelica Kontoroff  
60 East 42nd St., Suite 4600  
New York, NY 10165  
(212) 685-0969

**BERMAN DEVALERIO**

Jeffrey C. Block  
Bryan A. Wood  
Scott A. Mays  
One Liberty Square  
Boston, MA 02109  
(617) 542-8300

Co-Lead Counsel for Delaware Plaintiffs